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UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

IN RE: NATIONAL	)	MDL No. 2804
PRESCRIPTION OPIATE	)	
LITIGATION	)	Case No.
	)	1:17-MD-2804
	)	
THIS DOCUMENT RELATES TO	)	Hon. Dan A. Polster
ALL CASES	)	
	)	

— — —  
Friday, December 14, 2018  
— — —

HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER  
CONFIDENTIALITY REVIEW  
— — —

Videotaped Deposition of PATSY LITTLE,  
held at Stone Pigman Walther Wittmann LLC,  
909 Poydras, Suite 3150, New Orleans,  
Louisiana, commencing at 8:06 a.m., on the  
above date, before Michael E. Miller, Fellow  
of the Academy of Professional Reporters,  
Registered Diplomate Reporter, Certified  
Realtime Reporter and Notary Public.

— — —  
GOLKOW LITIGATION SERVICES  
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3 (Pages 6 to 9)

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<p style="text-align: right;">Page 10</p> <p>1 PROCEEDINGS 2 (December 14, 2018 at 8:06 a.m.) 3 THE VIDEOGRAPHER: We're now on 4 the record. My name is David Lane, 5 videographer for Golkow Litigation 6 Services. Today's date is 7 December 14th, 2018. Our time is 8 8:05 a.m. 9 This deposition is taking place 10 in New Orleans, Louisiana in the 11 matter of National Prescription Opiate 12 Litigation. Our deponent today is 13 Patsy Little. 14 Counsel, please introduce 15 yourselves and state whom you 16 represent. 17 MS. FUMERTON: Tara Fumerton on 18 behalf of Walmart and the witness, and 19 with me today is Scott Elmer and 20 Jennifer Bechet. 21 MR. CIULLO: Zachary Cuillo 22 from Kirkland &amp; Ellis on behalf of 23 Allergan Finance LLC. 24 MR. BOWER: Zach Bower on 25 behalf of plaintiffs in the MDL.</p>	<p style="text-align: right;">Page 12</p> <p>1 will now swear in the witness. 2 PATSY LITTLE, 3 having been duly sworn, 4 testified as follows: 5 EXAMINATION 6 BY MR. BOWER: 7 Q. Good morning, Ms. Little. How 8 are you today? 9 A. Good morning. Great. 10 Q. Thank you for being here. We 11 appreciate it. 12 Have you ever been deposed 13 before? 14 A. I have not. 15 Q. You have not, okay. So I'm 16 sure your counsel went over a few ground 17 rules for you, but just so we're all on the 18 same page, let's talk about that for a 19 minute. 20 I need you to answer if it's a 21 yes-or-no question verbally, so in other 22 words, don't nod your head, so the court 23 reporter can take down your answer. Do you 24 understand that? 25 A. Yes, I do.</p>
<p style="text-align: right;">Page 11</p> <p>1 MS. BARTLETT: Caroline 2 Bartlett on behalf of plaintiffs in 3 the MDL. 4 THE VIDEOGRAPHER: Will counsel 5 on the phone please introduce 6 themselves. 7 MR. HAWKINS: This is Will 8 Hawkins from Williams &amp; Connolly on 9 behalf of Cardinal Health. 10 MR. LADD: This is Matthew Ladd 11 of Morgan Lewis &amp; Bockius on behalf of 12 Rite Aid. 13 MS. SUNDERLAND: This is Sara 14 Sunderland with Covington &amp; Burling on 15 behalf of McKesson. 16 MR. FAUVRE: David Fauvre from 17 Arnold &amp; Porter on behalf of the Endo 18 and Par defendants. 19 MS. NOWAK: Darlene Nowak, 20 Marcus &amp; Shapira, on behalf of HBC 21 Services. 22 MR. INNES: Michael Innes on 23 behalf of plaintiffs in the MDL. 24 THE VIDEOGRAPHER: The court 25 reporter today is Mike Miller, and he</p>	<p style="text-align: right;">Page 13</p> <p>1 Q. Okay. And in addition, I know 2 the court reporter has reminded you of this 3 already, but please let me finish my 4 questions. Give your counsel an opportunity 5 to object before you provide your answers, 6 okay? 7 A. Okay. 8 Q. And as we go through the day, 9 if you don't understand a question, please 10 let me know and I will rephrase the question. 11 Otherwise, if you answer the question, I will 12 assume that you understood the question. 13 Do you understand that? 14 A. Yes, I do. 15 Q. Okay. Is there anything that 16 would prevent you from testifying truthfully 17 today? 18 A. There is not. 19 Q. Okay. Do you have any 20 questions before we begin? 21 A. I do not. 22 Q. Okay. Who is representing you 23 here today? 24 A. Tara and Scott. 25 Q. Okay. When was the first time</p>

4 (Pages 10 to 13)

Page 16



1 A. Whenever I had that first phone  
2 call with the Walmart attorney in October or  
3 November.  
4 Q. Are you a current employee of  
5 Walmart?  
6 A. I am not.  
7 Q. When did you end your  
8 employment at Walmart?  
9 A. In April of 2018.  
10 Q. Where do you currently work?  
11 A. I work at Louisiana Wholesale  
12 Drugs.  
13 Q. Okay. And what do you do for  
14 Louisiana Wholesale Drugs?  
15 A. I'm in purchasing for them.  
16 Q. Can you just describe briefly  
17 what type of business Louisiana Wholesale  
18 Drugs is in. Is it distribution?  
19 A. Yes, it's a wholesaler, a  
20 regional wholesaler for prescription drugs  
21 and OTC items.

Page 17

20 Q. Who is responsible for  
21 purchasing Schedule II narcotics for the  
22 Louisiana wholesale company?  
23 MS. FUMERTON: And I just am  
24 going to object to the line of  
25 questioning. I think it's appropriate



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<p style="text-align: right;">Page 18</p> <p>1 to ask her general --</p> <p>2 MR. BOWER: I'm not -- you</p> <p>3 can --</p> <p>4 MS. FUMERTON: No, no, I'm</p> <p>5 telling you --</p> <p>6 MR. BOWER: You can make your</p> <p>7 objection and we can move own.</p> <p>8 MS. FUMERTON: Well, no, I'm</p> <p>9 going to instruct her not to answer.</p> <p>10 I'm telling you --</p> <p>11 MR. BOWER: You're instructing</p> <p>12 her not to answer that?</p> <p>13 MS. FUMERTON: -- if you start</p> <p>14 to go into -- this is not a deposition</p> <p>15 about her current employer. I think</p> <p>16 general background information is</p> <p>17 okay. You can ask her general</p> <p>18 questions of what she does, but their</p> <p>19 counsel is not here, and she's here</p> <p>20 as -- in her capacity as a former</p> <p>21 Walmart employee. And so that's why</p> <p>22 I'm telling you what my position is</p> <p>23 with respect to this.</p> <p>24 MR. BOWER: Tara, I'm not</p> <p>25 wasting time on the record all day</p>	<p style="text-align: right;">Page 20</p> <p>1 Q. Are you refusing to answer that</p> <p>2 question?</p> <p>3 A. I would prefer to not answer</p> <p>4 the question.</p> <p>5 MS. FUMERTON: I'm going to</p> <p>6 instruct her not to answer the</p> <p>7 question.</p> <p>8 MR. BOWER: And what's your</p> <p>9 basis for that instruction?</p> <p>10 MS. FUMERTON: Again, because</p> <p>11 her counsel is not here for her</p> <p>12 current company. I'm respecting her</p> <p>13 today, and I'm -- as her counsel here</p> <p>14 today, I am instructing her not to</p> <p>15 answer that question because you're</p> <p>16 getting into the details of a</p> <p>17 different entity that is not why she's</p> <p>18 here to testify today.</p> <p>19 If you want to ask her about</p> <p>20 whether or not she has -- what her</p> <p>21 role is in her current job, that's</p> <p>22 fine. If you start asking her</p> <p>23 questions about what other people and</p> <p>24 other individuals did at her current</p> <p>25 position or her current employer, I'm</p>
<p style="text-align: right;">Page 19</p> <p>1 with your speaking objections. You</p> <p>2 can make your objection and we can</p> <p>3 move on.</p> <p>4 MS. FUMERTON: And I'm telling</p> <p>5 you that I'm not going to let you --</p> <p>6 MR. BOWER: So if you want</p> <p>7 to --</p> <p>8 (Simultaneous discussion</p> <p>9 interrupted by the reporter.)</p> <p>10 MR. BOWER: If you want to</p> <p>11 instruct her not to answer, then do</p> <p>12 so. If not, make your objection and</p> <p>13 we'll move on, okay.</p> <p>14 Can you read back the last</p> <p>15 question, please.</p> <p>16 (The following portion of the</p> <p>17 record was read.)</p> <p>18 "QUESTION: Who is responsible</p> <p>19 for purchasing Schedule II narcotics</p> <p>20 for the Louisiana wholesale company? "</p> <p>21 (End of readback.)</p> <p>22 A. I have been instructed by my</p> <p>23 current employer's attorney to not answer</p> <p>24 questions about my current job duties.</p> <p>25 BY MR. BOWER:</p>	<p style="text-align: right;">Page 21</p> <p>1 going to instruct her not to answer.</p> <p>2 MR. BOWER: Move to strike</p> <p>3 counsel's colloquy from the record.</p> <p>4 What is the basis for your</p> <p>5 objection?</p> <p>6 MS. FUMERTON: Because her --</p> <p>7 you have not noticed her up in her</p> <p>8 capacity as a witness for her current</p> <p>9 employer. She has been noticed up and</p> <p>10 you have communicated with me as a --</p> <p>11 and have asked for her in her position</p> <p>12 as a former Walmart employee.</p> <p>13 BY MR. BOWER:</p> <p>14 Q. Are you going to not answer the</p> <p>15 question, ma'am?</p> <p>16 A. Yes, I'm not going to answer</p> <p>17 the question.</p> <p>18 Q. Are you going to refuse to</p> <p>19 answer any questions about your current</p> <p>20 employment?</p> <p>21 A. No, I'm okay -- I'm happy to</p> <p>22 answer questions in what I do in my current</p> <p>23 employment.</p> <p>24 </p> <p>25 </p>

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[REDACTED]

15 MS. FUMERTON: Objection, I'm  
16 going to instruct her not to answer.

17 BY MR. BOWER:

18 Q. Are you familiar with that?

19 A. I'm familiar, yes.

20 Q. Are you going to not answer  
21 that question as well?

22 MS. FUMERTON: I'm going to  
23 instruct her not to answer the  
24 question.

25 BY MR. BOWER:

Page 24

1 that document?

2 A. Yes, I am.

3 Q. Okay. What is that document?

4 A. This is a résumé that I had  
5 uploaded to LinkedIn.

6 Q. Okay. And if you notice,  
7 there's no Louisiana Wholesale Drug company  
8 mentioned on this document; is that correct?

9 A. That's correct.

10 Q. Is there a reason you haven't  
11 updated your LinkedIn profile?

12 A. It's just not something that I  
13 actively do.

14 Q. When was the last time you  
15 updated it?

16 A. I would probably say, and I  
17 don't know for sure, but when I uploaded this  
18 document, maybe.

19 Q. Okay. You notice under  
20 Experience it says February 2014 to present?

21 A. Yes.

22 Q. You see that?

23 So your LinkedIn profile, then,  
24 is not accurate; is that correct?

25 A. Correct.

Page 23

1 Q. Does Ms. Fumerton represent  
2 Louisiana Wholesale Drug company?

3 A. No, she does not.

4 Q. Are you going to listen to her  
5 instructions?

6 A. Yes.

7 Q. Okay.

8 (Walmart-Little Exhibit 1  
9 marked.)

10 MR. BOWER: I would just note  
11 for the record while you review  
12 Exhibit 1 that we don't know whether  
13 my questions are relevant because you  
14 won't answer them, so we will keep  
15 this deposition open to the extent  
16 it's necessary.

17 MS. FUMERTON: I disagree with  
18 your characterization because your  
19 questions about what Louisiana  
20 Wholesale did or did not do is not  
21 relevant to this litigation and  
22 specifically this deposition.

23 BY MR. BOWER:

24 Q. You've been handed what's been  
25 marked as Exhibit 1. Are you familiar with

Page 25

1 MS. FUMERTON: Objection.  
2 Objection, form.

3 And just give me a second.  
4 You're both fast talkers, so you need  
5 to just pause a second after he asks  
6 his question.

7 BY MR. BOWER:

8 Q. Why did you leave Walmart to go  
9 to Louisiana Wholesale Drug company?

10 A. There were some personal  
11 reasons. My mother-in-law had passed away,  
12 and my husband was interested in getting back  
13 closer to his family and his father.

14 Q. So at the time you were living  
15 in Bentonville when you worked for Walmart?

16 A. Correct.

17 Q. And now you've moved back to  
18 Louisiana; is that correct?

19 A. Correct.

20 Q. And that's where you're from  
21 originally?

22 A. We lived there the ten years  
23 prior to moving to Walmart.

24 Q. And that's where you went to  
25 college as well, right?

7 (Pages 22 to 25)



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1 A. Yes, correct.  
 2 Q. I just have a few questions  
 3 regarding your profile. Other than the fact  
 4 that you haven't updated it recently, is the  
 5 experience that you've included here  
 6 accurate?  
 7 A. Yes.  
 8 Q. Okay. I just have a couple of  
 9 questions then on some of the things you've  
 10 listed here on your experience. Let's start,  
 11 I guess, from when you began at Walmart,  
 12 which was 2007, correct?  
 13 A. January of 2008.  
 14 Q. Okay. Did you take a job at  
 15 Walmart directly after graduating from  
 16 Louisiana State University?  
 17 A. No, I graduated from LSU the  
 18 first time in 1990.  
 19 Q. Okay.  
 20 A. I had finished my M.B.A. in May  
 21 of 2007.  
 22 Q. What did you do between -- just  
 23 very briefly, between 1990 and 1993 -- strike  
 24 that.  
 25 Were you a registered nurse in

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1 After Hours, which was an acute care setting.  
 2 I worked at St. Elizabeth Hospital and I  
 3 worked for Infusion Network.  
 4 Q. Okay. Thank you for that.  
 5 Then in 2005 you went to  
 6 Louisiana State to get your master's degree,  
 7 correct?  
 8 A. That's correct.  
 9 Q. Did you begin working with  
 10 Walmart directly after graduating with your  
 11 master's degree?  
 12 A. About six or seven months  
 13 later.  
 14 Q. And what were you hired at  
 15 Walmart to do?  
 16 A. To be a buyer in the pharmacy  
 17 department.

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1 1993?  
 2 A. I think I graduated in '95.  
 3 Q. Okay.  
 4 MS. FUMERTON: And you can look  
 5 at the document too.  
 6 BY MR. BOWER:  
 7 Q. Yeah, sure, please look at the  
 8 document. I'm just trying to get a very  
 9 brief understanding of your background.  
 10 I noticed that under Education  
 11 you have two things listed, Itawamba  
 12 Community College and then Louisiana State.  
 13 It appears that you were a Registered Nurse;  
 14 is that correct?  
 15 A. I was a Registered Nurse, and  
 16 this date of completion of 2005 is not  
 17 accurate. It was 1995.  
 18 Q. Okay. That clears that up.  
 19 Were you a practicing nurse  
 20 from 1995 until 2005 approximately?  
 21 A. Until 2007.  
 22 Q. Okay. And where were you  
 23 employed during that time period?  
 24 A. There were multiple places. I  
 25 had worked at Ascension Hospital, at Lake

Page 29

1 [REDACTED]  
 2 [REDACTED]  
 3 [REDACTED]  
 4 [REDACTED]  
 5 [REDACTED]  
 6 [REDACTED]  
 7 [REDACTED]  
 8 [REDACTED]  
 9 [REDACTED]  
 10 [REDACTED]  
 11 [REDACTED]  
 12 [REDACTED]  
 13 [REDACTED]  
 14 [REDACTED]  
 15 [REDACTED]  
 16 [REDACTED]  
 17 [REDACTED]  
 18 [REDACTED]  
 19 [REDACTED]  
 20 [REDACTED]  
 21 [REDACTED]  
 22 [REDACTED]  
 23 [REDACTED]  
 24 [REDACTED]  
 25 [REDACTED]

8 (Pages 26 to 29)



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<p>Page 30</p> <p>[REDACTED]</p>	<p>Page 32</p> <p>[REDACTED]</p>
<p>Page 31</p> <p>[REDACTED]</p>	<p>Page 33</p> <p>[REDACTED]</p>

9 (Pages 30 to 33)

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6 Q. Are you aware the country is in  
7 the middle of an opioid crisis?  
8 MS. FUMERTON: Objection, form.  
9 A. I'm aware that there are people  
10 that are addicted to opioids and I'm aware  
11 that there are people that use prescription  
12 opioids for legitimate reasons every day.  
13 BY MR. BOWER:  
14 Q. Do you think the country is in  
15 the middle of an opioid crisis?  
16 MS. FUMERTON: Objection, form.  
17 A. There's a lot of attention  
18 regarding this subject. I haven't looked at  
19 documents. I haven't read much about it.  
20 I'm not sure how I feel about that. I think  
21 "crisis" is a difficult word. I'm not sure  
22 how I feel about it.  
23 BY MR. BOWER:  
24 Q. What word would you use?  
25 MS. FUMERTON: Objection, form.

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[REDACTED]

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1 A. I think any -- I think  
2 addiction to any substance is disheartening  
3 and is sad, whether it's opioid or a  
4 different substance, and I think there are  
5 plenty of issues.  
6 BY MR. BOWER:  
7 Q. Have you seen any of the TV  
8 reports on the opioid crisis?  
9 A. I haven't -- I've seen the  
10 opioid crisis in the news. I haven't focused  
11 or studied what the -- what the facts are  
12 behind those, so I'm not familiar with the  
13 numbers.  
14 Q. Did you ever discuss the opioid  
15 problem while you were at Walmart with  
16 anybody?

17 MS. FUMERTON: Objection, form.

[REDACTED]

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[REDACTED]

12 BY MR. BOWER:  
13 Q. Let's go back to Exhibit 1,  
14 just a few more questions on your résumé,  
15 okay?  
16 A. Yes.  
17 Q. Going back to your time from  
18 2007 to 2014, you're an Rx buyer. Do you see  
19 that on the second page there, about halfway  
20 down?  
21 A. Yes.  
22 Q. Okay. Are those dates accurate  
23 there, 2007 to February of 2014? I believe  
24 you said it started in 2008, correct?  
25 A. Yes, I started in January of

10 (Pages 34 to 37)

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1 2008.  
2 Q. And is the end date  
3 approximately correct that you were the Rx  
4 buyer?  
5 A. It would have ended when I left  
6 Walmart in April of 2018.  
7 Q. Well, I noticed on page 1 you  
8 have senior Rx buyer, if you'd turn to  
9 page 1. Did you at some point receive a  
10 promotion from Rx buyer to senior Rx buyer?  
11 A. Yes.  
12 Q. Approximately when did you --  
13 A. I don't recall that date.  
14 Well, February 14th, I guess, according to  
15 the résumé.  
16 Q. Okay. Well, let me ask it a  
17 different way. Did that promotion -- strike  
18 that.  
19 Would you agree that was a  
20 promotion?  
21 A. Yes.  
22 Q. Did that have any change in  
23 your duties and responsibilities?

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11 (Pages 38 to 41)

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[REDACTED]

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[REDACTED]

18 MR. BOWER: What's the nature  
19 of that objection?

20 MS. FUMERTON: "Certain  
21 obligations" is incredibly vague,  
22 especially -- "in distributing  
23 prescription opioids" is also  
24 extremely vague and could be  
25 interpreted very broad or very

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[REDACTED]

Page 45

1 narrowly.

2 MR. BOWER: Any other  
3 objections you have to that, other  
4 than vagueness?

5 MS. FUMERTON: Well, I think  
6 that can be confusing in that regard  
7 as well.

8 BY MR. BOWER:

9 Q. What obligations are you  
10 familiar with respect to Walmart's  
11 distribution of prescription opiates?

12 MS. FUMERTON: Objection, form.

[REDACTED]

12 (Pages 42 to 45)



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<p>Page 46</p> <p>[REDACTED]</p>	<p>Page 48</p> <p>[REDACTED]</p>
<p>Page 47</p> <p>[REDACTED]</p>	<p>Page 49</p> <p>[REDACTED]</p>

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[REDACTED]

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[REDACTED]

19 BY MR. BOWER:

20 Q. All right. Let's go back to  
21 your Exhibit 1 for a moment.

22 A. Okay.

23 Q. I want to go turn to page 2 for  
24 a moment and I want to ask a couple of  
25 questions on those bullet points on kind of

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[REDACTED]

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1 the top half of the page there. One of the  
2 bullet points you note that you successfully  
3 led category participation in hydrocodone  
4 reclassification.

5 Do you see that?

6 A. Yes, I see that.

7 Q. What does that mean?

8 A. I was a conduit on the  
9 merchandising side for the C-II manufacturers  
10 in our warehousing department in the moving  
11 of our vault at a time period while we were  
12 there.

13 Q. What does category  
14 participation mean?

15 A. That would be the merchandising  
16 category.

17 Q. Okay. What manufacturer did  
18 you work with in context with that effort?

19 MS. FUMERTON: Objection, form.

[REDACTED]

14 (Pages 50 to 53)



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Page 58

[REDACTED]

Page 60

[REDACTED]

Page 59

[REDACTED]

Page 61

[REDACTED]

16 (Pages 58 to 61)





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<p>Page 66</p> <p>[REDACTED]</p> <p>6 Q. And the first bullet point</p> <p>7 there on that page, Implemented a redesigned</p> <p>8 rebate tracking and collection process, do</p> <p>9 you see that?</p> <p>10 A. Yes, I do.</p> <p>11 Q. What does that refer to?</p> <p>[REDACTED]</p>	<p>Page 68</p> <p>[REDACTED]</p>
<p>Page 67</p> <p>[REDACTED]</p>	<p>Page 69</p> <p>[REDACTED]</p>

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Page 70

[REDACTED]

[REDACTED]

11 Q. Okay. Just a couple more  
12 questions on your résumé. Going back to the  
13 first page, second bullet from the bottom,  
14 Introduced an audit process.  
15 Do you see that?  
16 A. Yes.  
17 Q. What was that process?

[REDACTED]

[REDACTED]

Page 72

[REDACTED]

[REDACTED]

Page 71

[REDACTED]

[REDACTED]

Page 73

[REDACTED]

[REDACTED]

19 (Pages 70 to 73)

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Page 74

[REDACTED]

Page 76

[REDACTED]

Page 75

[REDACTED]

Page 77

[REDACTED]

20 (Pages 74 to 77)



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Page 78

[REDACTED]

13 MS. FUMERTON: We've been going  
14 around an hour. Can we take a break?

15 MR. BOWER: Sure.

16 THE VIDEOGRAPHER: Going off  
17 the record, 9:03 a.m.

18 (Recess taken, 9:03 a.m. to  
19 9:24 a.m.)

20 THE VIDEOGRAPHER: Back on  
21 record at 9:24 a.m.

22 (Walmart-Little Exhibit 2  
23 marked.)

24 BY MR. BOWER:

25 Q. I'm going to hand you what's

Page 80

1 MR. CIULLO: You don't happen  
2 to have an extra copy, do you?

3 MR. BOWER: Oh, we didn't pass  
4 them out? Did he pass them out?  
5 (Comments off the stenographic  
6 record.)

7 BY MR. BOWER:

8 Q. Have you had a chance to read  
9 the document, ma'am?

10 A. Yes, I did.

11 Q. Does this document look  
12 familiar to you?

13 A. It does not.

14 Q. It does not, okay.

15 Would you be surprised if this  
16 came from your custodial file?

17 A. No, I would not.

18 Q. And why not?

19 A. Well, we -- A, I probably don't  
20 understand what "custodial file" is, so I  
21 might need clarification on that.

22 Q. Okay. Do you  
23 understanding that Walmart -- strike that.

24 Do you have any understanding  
25 that Walmart has produced documents to

Page 79

1 been marked as Exhibit 2 to today's  
2 deposition. Just take a moment and review  
3 that document.

4 And for the record, the  
5 document is Bates-labeled WMT\_MDL, and then  
6 it's 000025989.

7 (Document review.)

8 A. Okay.

9 MS. FUMERTON: Zach, is the  
10 writing -- was that on there when it  
11 was produced?

12 MR. BOWER: Yeah.

13 MS. FUMERTON: Okay.

14 MR. BOWER: I believe so. I  
15 mean, as it was produced?

16 MS. FUMERTON: Yeah.

17 MR. BOWER: Okay. Yeah, I  
18 don't believe it's -- I don't know if  
19 it's her writing. I'm going to ask --

20 MS. FUMERTON: Sure. No, no.  
21 I guess my question is it's not yours;  
22 it's somebody else's.

23 MR. BOWER: No. So to the best  
24 of my understanding, it's not ours.

25 MS. FUMERTON: Okay.

Page 81

1 plaintiffs in this case?

2 MS. FUMERTON: Objection. I  
3 just caution her that to the extent  
4 that we've had any conversations, she  
5 cannot reveal the content of those  
6 conversations.

7 MR. BOWER: I'll rephrase the  
8 question.

9 BY MR. BOWER:

[REDACTED]

21 (Pages 78 to 81)

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Page 82

[REDACTED]

Page 84

[REDACTED]

Page 83

[REDACTED]

Page 85

[REDACTED]

13 Q. In connection with preparing  
14 for your deposition today, did you review  
15 documents?

16 A. I reviewed some documents, yes.

17 Q. Were those documents provided  
18 to you by counsel for Walmart?

19 A. They were provided by my  
20 counsel.

21 Q. Is that your counsel that's  
22 here today?

23 A. Yes.

24 Q. And they're counsel for  
25 Walmart, correct?

22 (Pages 82 to 85)

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<p style="text-align: right;">Page 86</p> <p>1 A. I assume.</p> <p>2 Q. Is that your understanding?</p> <p>3 A. Yes.</p> <p>4 Q. What is your understanding as</p> <p>5 to who Ms. Fumerton represents?</p> <p>6 A. She is representing me.</p> <p>7 Q. Are you paying her bills?</p> <p>8 A. I am not paying her bills.</p> <p>9 Q. Do you know who is paying her</p> <p>10 bills?</p> <p>11 A. Walmart is paying her.</p> <p>12 Q. Walmart is paying her bills on</p> <p>13 your behalf, correct?</p> <p>14 A. Yes.</p> <p>15 Q. So she's representing both you</p> <p>16 and Walmart today? Is that your</p> <p>17 understanding?</p> <p>18 A. Yes.</p> <p>19 Q. How much time did you spend</p> <p>20 preparing for today's deposition?</p> <p>21 A. We met yesterday.</p> <p>22 Q. And how long did you meet for?</p> <p>23 A. Yesterday during the day, eight</p> <p>24 hours.</p> <p>25 Q. Okay. And who was present for</p>	<p style="text-align: right;">Page 88</p> <p>[REDACTED]</p>
<p style="text-align: right;">Page 87</p> <p>1 that meeting?</p> <p>2 A. Tara, Scott and Jennifer.</p> <p>3 Q. Anyone else?</p> <p>4 A. There were a couple of people</p> <p>5 on the phone.</p> <p>6 Q. Who was on the phone?</p> <p>7 A. I don't remember who was on the</p> <p>8 phone. Carl from Walmart, and I don't</p> <p>9 remember.</p> <p>10 Q. Okay. Other than speaking with</p> <p>11 counsel, did you speak with anyone else about</p> <p>12 this case prior to today?</p> <p>13 A. No.</p> <p>14 Q. Did you speak with any folks at</p> <p>15 Walmart about the case?</p> <p>16 A. No.</p> <p>17 Q. Speak with Mr. Badeen?</p> <p>18 A. No.</p> <p>19 Q. No?</p> <p>20 Have you reviewed any written</p> <p>21 material -- written transcripts of other</p> <p>22 folks' testimony?</p> <p>23 A. I have not.</p> <p>[REDACTED]</p>	<p style="text-align: right;">Page 89</p> <p>[REDACTED]</p>

23 (Pages 86 to 89)

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<p>Page 90</p> <p>[REDACTED]</p>	<p>Page 92</p> <p>[REDACTED]</p>
<p>Page 91</p> <p>[REDACTED]</p>	<p>Page 93</p> <p>[REDACTED]</p>

24 (Pages 90 to 93)





Could you read back the question, please?



12 (The following portion of the  
13 record was read.)

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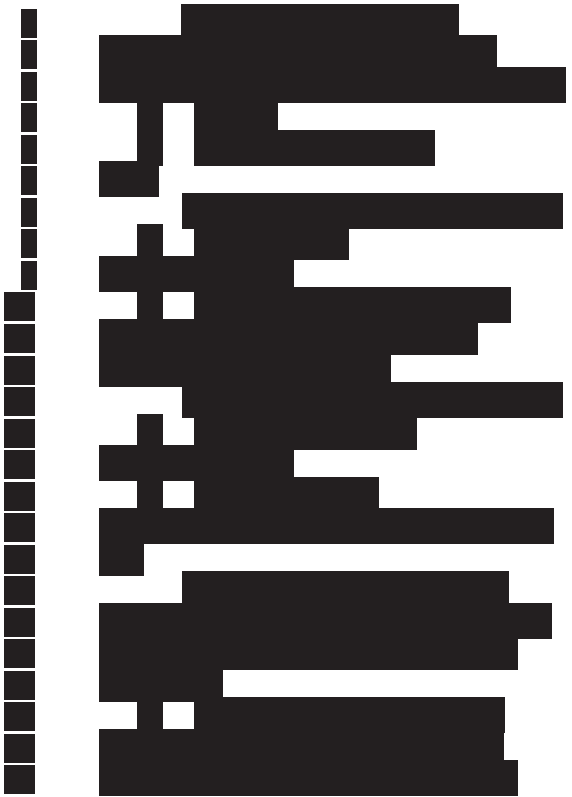
<p>Page 98</p> <p>[REDACTED]</p>	<p>Page 100</p> <p>[REDACTED]</p>
<p>Page 99</p> <p>[REDACTED]</p>	<p>Page 101</p> <p>[REDACTED]</p>

26 (Pages 98 to 101)

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<div>Page 102</div> <div>A large rectangular area of the page is completely redacted with black ink. To the left of this area is a vertical column of small, dark rectangular marks, possibly representing a margin or a list of items.</div>	<div>Page 104</div> <div>A large rectangular area of the page is completely redacted with black ink. To the left of this area is a vertical column of small, dark rectangular marks, possibly representing a margin or a list of items.</div>
<div>Page 103</div> <div>A large rectangular area of the page is completely redacted with black ink. To the left of this area is a vertical column of small, dark rectangular marks, possibly representing a margin or a list of items.</div>	<div>Page 105</div> <div>A large rectangular area of the page is completely redacted with black ink. To the left of this area is a vertical column of small, dark rectangular marks, possibly representing a margin or a list of items.</div>

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<div>Page 106</div> <div></div>	<div>Page 108</div> <div></div>
<div>Page 107</div> <div></div>	<div>Page 109</div> <div></div>

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Page 110

[REDACTED]

Page 112

[REDACTED]

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[REDACTED]

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[REDACTED]

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[REDACTED]

Page 116

[REDACTED]

Page 115

[REDACTED]

Page 117

[REDACTED]

30 (Pages 114 to 117)

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<p>Page 118</p> <p>[REDACTED]</p>	<p>Page 120</p> <p>[REDACTED]</p>
<p>Page 119</p> <p>[REDACTED]</p>	<p>Page 121</p> <p>[REDACTED]</p>



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<p>Page 122</p> <p>[REDACTED]</p>	<p>Page 124</p> <p>[REDACTED]</p>
<p>Page 123</p> <p>[REDACTED]</p>	<p>Page 125</p> <p>[REDACTED]</p>

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Page 126

1 [REDACTED]  
 2 [REDACTED]  
 3 [REDACTED]  
 4 [REDACTED]  
 5 [REDACTED]  
 6 [REDACTED]  
 7 [REDACTED]  
 8 [REDACTED]  
 9 [REDACTED]  
 10 [REDACTED]  
 11 [REDACTED]  
 12 [REDACTED]  
 13 [REDACTED]  
 14 [REDACTED]  
 15 [REDACTED]  
 16 [REDACTED]  
 17 [REDACTED]  
 18 [REDACTED]  
 19 [REDACTED]  
 20 [REDACTED]  
 21 [REDACTED]  
 22 [REDACTED]  
 23 [REDACTED]  
 24 BY MR. BOWER:  
 25 Q. Were you aware whether the

Page 128

1 the increase in prescription orders during  
 2 this time period for oxycodone?  
 3 MS. FUMERTON: Objection, form,  
 4 lacks foundation.  
 5 A. I did not have any concern, no.  
 6 BY MR. BOWER:  
 7 Q. Why not?  
 8 A. I can't recall.  
 9 Q. Okay.  
 10 (Walmart-Little Exhibit 4  
 11 marked.)  
 12 MR. BOWER: This is 4, I  
 13 believe.  
 14 BY MR. BOWER:  
 15 [REDACTED]  
 16 [REDACTED]  
 17 [REDACTED]  
 18 [REDACTED]  
 19 [REDACTED]  
 20 [REDACTED]  
 21 MS. FUMERTON: You can take a  
 22 minute to review the document.  
 23 So Zach, it looks like there's  
 24 a page missing based on the sequence  
 25 of the Bates numbers.

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1 country was in the middle of an opioid  
 2 epidemic in 2009?  
 3 MS. FUMERTON: Objection, form.  
 4 A. In 2009 I was not aware.  
 5 BY MR. BOWER:  
 6 Q. Do you know whether the country  
 7 was enduring an epidemic in 2009?  
 8 MS. FUMERTON: Objection, form.  
 9 A. I do not know.  
 10 BY MR. BOWER:  
 11 Q. Do you know whether people were  
 12 dying from oxycodone overdoses in 2009?  
 13 MS. FUMERTON: Objection, form.  
 14 A. From my past history of working  
 15 in the emergency room, I knew that people  
 16 died of overdoses from drugs, yes.  
 17 BY MR. BOWER:  
 18 Q. And you knew specifically that  
 19 they died of overdoses of oxycodone, right?  
 20 MS. FUMERTON: Objection, form.  
 21 A. I've seen overdoses of  
 22 different drugs, oxycodone included, but  
 23 other drugs as well.  
 24 BY MR. BOWER:  
 25 Q. Did you have any concerns about

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1 MR. CIULLO: Looks like there's  
 2 a page missing also -- looks like this  
 3 was produced in the Chicago litigation  
 4 from Actavis. It doesn't have the  
 5 confidential stamp at the bottom.  
 6 There are subsequent productions  
 7 from -- under the Allergan MDL Bates  
 8 numbers that do have that.  
 9 MR. BOWER: Okay.  
 10 MR. CIULLO: So this should be  
 11 treated as a confidential document.  
 12 MR. BOWER: Okay. That's fine.  
 13 She's on this e-mail.  
 14 MR. CIULLO: Of course.  
 15 MR. BOWER: That's fine. We'll  
 16 certainly treat this as confidential.  
 17 MR. CIULLO: Of course, thank  
 18 you so much.  
 19 MS. FUMERTON: But I'm going to  
 20 object to the use of the document as  
 21 being incomplete since it's missing a  
 22 page number based on the Bates  
 23 numbers.  
 24 MR. BOWER: That's fine, we can  
 25 just look at the e-mail. If you want

33 (Pages 126 to 129)

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<p>1 to object to that, you can pull out 65</p> <p>2 and 66 if you want. If you're going</p> <p>3 to make that objection --</p> <p>4 MS. FUMERTON: Yeah, I am</p> <p>5 making that objection.</p> <p>6 MR. BOWER: -- and you're going</p> <p>7 to represent that you don't believe</p> <p>8 this is an accurate document, then we</p> <p>9 can remove it.</p> <p>10 MS. FUMERTON: Well, it's</p> <p>11 missing a page is what I'm making a</p> <p>12 representation of. I don't have</p> <p>13 personal knowledge of whether or not</p> <p>14 this is an accurate document or not.</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 MS. FUMERTON: Yes, Zach, I do.</p> <p>20 Do you see the Bates number?</p> <p>21 MR. BOWER: I do.</p> <p>22 MS. FUMERTON: Do you see it</p> <p>23 goes to 662 then 663 --</p> <p>24 MR. BOWER: I do. And maybe</p> <p>25 that page --</p>	<p>1 going to object to the exhibit's use</p> <p>2 since it's incomplete. Removing these</p> <p>3 two pages also makes it incomplete.</p> <p>4 It is just an incomplete document.</p> <p>5 If you have the entire</p> <p>6 document, I would appreciate that you</p> <p>7 use it with the witness so that we can</p> <p>8 be as accurate as possible and not --</p> <p>9 MR. BOWER: Okay. So we will</p> <p>10 use the e-mail that the witness</p> <p>11 received.</p> <p>12 MS. FUMERTON: And then the</p> <p>13 e-mail is now incomplete.</p> <p>14 MR. BOWER: We're allowed to</p> <p>15 use e-mails. We're allowed to use</p> <p>16 e-mails without attachments. Are you</p> <p>17 saying we're not allowed to use an</p> <p>18 e-mail without an attachment?</p> <p>19 MS. FUMERTON: I'm saying that</p> <p>20 you're going to have to represent that</p> <p>21 the document is incomplete. If you</p> <p>22 want to say that I am using an e-mail</p> <p>23 that is incomplete with the witness,</p> <p>24 that's fine. That's your prerogative.</p> <p>25 MR. BOWER: I'm not saying</p>
Page 131	Page 133
<p>1 MS. FUMERTON: -- and then it</p> <p>2 misses a page and then has 665.</p> <p>3 MR. BOWER: Maybe that cover</p> <p>4 page is missing --</p> <p>5 (Simultaneous discussion</p> <p>6 interrupted by the reporter.)</p> <p>7 MR. BOWER: But like I said, if</p> <p>8 you want to make that -- if you want</p> <p>9 to make that an issue, we can remove</p> <p>10 it from the record. That's fine.</p> <p>11 MS. FUMERTON: Okay.</p> <p>12 MR. BOWER: So if you want to</p> <p>13 just pull out the last two pages of</p> <p>14 that.</p> <p>15 I understand your concern about</p> <p>16 the marketing fee, but we'll see a</p> <p>17 contract that she signs later that</p> <p>18 includes a marketing fee so --</p> <p>19 MS. FUMERTON: Well, Zach --</p> <p>20 MR. BOWER: -- I can absolve</p> <p>21 you of those concerns right now.</p> <p>22 MS. FUMERTON: First of all,</p> <p>23 you completely misrepresented what I</p> <p>24 said. Second of all, I'm going to</p> <p>25 object -- it's your exhibit. I'm</p>	<p>1 that. I'm saying you can remove the</p> <p>2 last two pages, and let me do that so</p> <p>3 the record is -- you just hand me that</p> <p>4 back, I'll review.</p> <p>5 So based upon your counsel's</p> <p>6 objection, we'll remove the last two</p> <p>7 pages of this document so that it's</p> <p>8 not in the record yet.</p> <p>9 MS. FUMERTON: Well, I'm</p> <p>10 objecting then to the use of the</p> <p>11 e-mail without the correct attachment.</p> <p>12 MR. BOWER: You can object to</p> <p>13 that but I don't believe there's</p> <p>14 anything preventing us from using an</p> <p>15 e-mail the witness received.</p> <p>16 MS. FUMERTON: Yeah --</p> <p>17 MR. BOWER: You can note your</p> <p>18 objection for the record.</p> <p>19 MS. FUMERTON: If you want to</p> <p>20 make the record, I just want the</p> <p>21 record to be clear that you are</p> <p>22 handing the witness a document with an</p> <p>23 e-mail that apparently had an</p> <p>24 attachment. You didn't bring the</p> <p>25 correct attachments or you brought it</p>

34 (Pages 130 to 133)

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<p style="text-align: right;">Page 134</p> <p>1 in a way that appears based on it to</p> <p>2 be incomplete, and that's my</p> <p>3 objection.</p> <p>4 MR. BOWER: What do you think</p> <p>5 is incomplete about the e-mail?</p> <p>6 MS. FUMERTON: Because there is</p> <p>7 another page that's apparently missing</p> <p>8 based on the Bates numbers. You are a</p> <p>9 lawyer. You understand how Bates</p> <p>10 numbers work.</p> <p>11 MR. BOWER: Yes.</p> <p>12 MS. FUMERTON: There's a</p> <p>13 missing Bates number.</p> <p>14 MR. BOWER: Sorry. So just for</p> <p>15 the record so we're all clear. The</p> <p>16 first page of this exhibit ends in 62.</p> <p>17 The second page of this exhibit ends</p> <p>18 in 63. Okay? That's the exhibit.</p> <p>19 It's two pages.</p> <p>20 MS. FUMERTON: And I will</p> <p>21 object to this exhibit because there</p> <p>22 is apparently a PDF that was attached</p> <p>23 to this exhibit that you are not</p> <p>24 including and showing to the witness.</p> <p>25 MR. BOWER: I don't think that</p>	<p style="text-align: right;">Page 136</p> <p>1 two pages. It's still an incomplete</p> <p>2 document. You can proceed how you</p> <p>3 wish and I'm objecting to the use of</p> <p>4 this document.</p> <p>5 MR. BOWER: Okay. I understand</p> <p>6 your concern about what the attachment</p> <p>7 says and that you've represented there</p> <p>8 were no marketing fees, but we'll see</p> <p>9 that document later again and we'll</p> <p>10 proceed.</p> <p>11 MS. FUMERTON: Apparently you</p> <p>12 do not understand because you keep</p> <p>13 misrepresenting what I said.</p> <p>14 MR. BOWER: Okay.</p> <p>15 MS. FUMERTON: I did not say I</p> <p>16 had a concern about the document. I</p> <p>17 had a concern this exhibit is</p> <p>18 incomplete.</p> <p>19 MR. BOWER: And I understand</p> <p>20 you have concerns about the exhibit,</p> <p>21 you don't want it in the record, but I</p> <p>22 can tell you that she signed that</p> <p>23 agreement, it will come into the</p> <p>24 record, so we can please move on.</p> <p>25 MS. FUMERTON: Still, you keep</p>
<p style="text-align: right;">Page 135</p> <p>1 that's accurate. If you want to</p> <p>2 produce something, some factual basis</p> <p>3 for your statement, that's fine. I</p> <p>4 will say that this e-mail appears to</p> <p>5 be a complete e-mail. If you notice,</p> <p>6 the end of it has the confidentiality</p> <p>7 signature that everyone has these</p> <p>8 days. I don't think there's anything</p> <p>9 incomplete about this e-mail.</p> <p>10 If you have a basis to tell us</p> <p>11 today that you think this is</p> <p>12 incomplete, please do so. But with</p> <p>13 that, I think we can move forward.</p> <p>14 MS. FUMERTON: No. I'm going</p> <p>15 to state again to be clear since you</p> <p>16 keep talking over me, I'm objecting to</p> <p>17 this exhibit because as you pointed</p> <p>18 out earlier, it says at the top that</p> <p>19 there's a PDF that's attached. You</p> <p>20 presented a document with a missing</p> <p>21 Bates number. I don't know why it was</p> <p>22 missing. Somehow it's missing, which</p> <p>23 gives me pause as to whether or not</p> <p>24 this is a complete document.</p> <p>25 So now you've removed the last</p>	<p style="text-align: right;">Page 137</p> <p>1 misrepresenting what I said. So if</p> <p>2 you would like to move on, please do</p> <p>3 not represent what I said because it's</p> <p>4 not what I said.</p> <p>5 MR. BOWER: Are you ready to</p> <p>6 proceed?</p> <p>7 THE WITNESS: Yes.</p> <p>8 BY MR. BOWER:</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>

35 (Pages 134 to 137)

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[REDACTED]

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[REDACTED]

22 MR. CIULLO: While we have a  
23 second, I just want to, for the  
24 record, represent that that missing  
25 document in the last exhibit was

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[REDACTED]

Page 145

1 actually just a JPEG thing that says  
2 Actavis.

3 MR. BOWER: Yeah, that's what I  
4 thought, but since I have it here I  
5 didn't need it, but I appreciate it.  
6 Thanks.

7 MR. CIULLO: I just wanted to  
8 clear that up for the record.

9 MR. BOWER: Hopefully that will  
10 resolve your concerns.

11 MS. FUMERTON: It was a simple  
12 concern.

13 MR. CIULLO: Legitimate  
14 concern.

15 (Document review.)

16 BY MR. BOWER:

17 Q. Have you had a chance to review  
18 the document, ma'am, or are you still  
19 looking?

20 A. Yes.

21 Q. You're still looking? Okay.

22 A. Okay.

23 Q. I just have a couple of  
24 questions on the e-mail, and then we can turn  
25 to the document itself.

37 (Pages 142 to 145)

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Page 146

[REDACTED]

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1 product or privileged information.  
2 MR. BOWER: I'm just asking  
3 whether she's been asked to produce  
4 documents that are relevant to this  
5 case. You're not going to let her  
6 answer that question.  
7 MS. FUMERTON: That's not what  
8 you asked.  
9 MR. BOWER: All right. Let me  
10 ask it that way.  
11 BY MR. BOWER:

[REDACTED]

Page 147

[REDACTED]

14 MS. FUMERTON: Objection, form  
15 in that to the extent you're --  
16 actually, I'm instructing her not to  
17 answer that question.  
18 MR. BOWER: That's a yes-or-no  
19 answer. You're instructing her not to  
20 answer that question?  
21 MS. FUMERTON: Yes, I am.  
22 MR. BOWER: What's the basis  
23 for your instruction?  
24 MS. FUMERTON: To the extent  
25 that you're invading attorney work

Page 149

[REDACTED]

38 (Pages 146 to 149)

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Page 150

[REDACTED]

Page 152

[REDACTED]

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[REDACTED]

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[REDACTED]

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[REDACTED]

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[REDACTED]

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[REDACTED]

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[REDACTED]

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[REDACTED]

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[REDACTED]

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[REDACTED]

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[REDACTED]

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[REDACTED]

Page 164

[REDACTED]

13 MS. FUMERTON: Oh, yeah, she  
14 was just asking if we could take a  
15 break.

16 MR. BOWER: Oh, sure. Yeah.

17 THE VIDEOGRAPHER: Going off  
18 the record, 10:37 a m.

19 (Recess taken, 10:37 a m. to  
20 10:58 a m.)

21 THE VIDEOGRAPHER: Back on  
22 record. The time is 10:58 a m.

23 (Walmart-Little Exhibit 7  
24 marked.)

25 ///

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[REDACTED]

Page 165

1 BY MR. BOWER:

2 Q. Back on the record, Exhibit 7.

3 MS. FUMERTON: Are we on  
4 Exhibit 7 or Exhibit 6?

5 MR. BOWER: I just gave her  
6 Exhibit 7, sorry.

7 MS. BARTLETT: We skipped 6.

8 MR. BOWER: We skipped 6.

9 Sorry, we're skipping 6 for now.

10 MS. FUMERTON: Okay. Are you  
11 going to use an Exhibit 6?

12 MS. BARTLETT: Huh-uh.

13 MR. BOWER: We may, we may not.

14 MS. FUMERTON: That's so  
15 confusing later on.

16 MR. BOWER: I know, I know.

17 MS. FUMERTON: Can we just  
18 change it?

19 MR. BOWER: You want to change  
20 it?

21 MS. FUMERTON: Why don't you  
22 change it, yeah.

23 MR. BOWER: Okay. Let's change  
24 that.

25 MS. FUMERTON: Sorry, but it

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<p style="text-align: right;">Page 166</p> <p>1 just --</p> <p>2 MR. BOWER: No, no, it's fine.</p> <p>3 MS. FUMERTON: -- a year from</p> <p>4 now --</p> <p>5 MR. BOWER: I agree with that.</p> <p>6 MS. FUMERTON: -- someone is</p> <p>7 going to...</p> <p>8 MS. BARTLETT: Then we're going</p> <p>9 to change -- I need all new stickers.</p> <p>10 They're all pre-marked.</p> <p>11 MS. FUMERTON: I still would</p> <p>12 change it. It's not going to take --</p> <p>13 it's not that many. We're talking,</p> <p>14 what, less than ten. Or are we</p> <p>15 talking more than that?</p> <p>16 MR. BOWER: Let's go off the</p> <p>17 record.</p> <p>18 THE VIDEOGRAPHER: Going off</p> <p>19 the record. The time is 10:59 a m.</p> <p>20 (Discussion off the record.)</p> <p>21 THE VIDEOGRAPHER: Back on</p> <p>22 record, 11:01 a.m.</p> <p>23 (Walmart-Little Exhibit 6</p> <p>24 marked.)</p> <p>25 ///</p>	<p style="text-align: right;">Page 168</p> <p>1 THE VIDEOGRAPHER: Off record,</p> <p>2 11:02 a.m.</p> <p>3 (Discussion off the record.)</p> <p>4 THE VIDEOGRAPHER: Back on</p> <p>5 record, 11:03 a m.</p> <p>6 BY MR. BOWER:</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 is offering Walmart a one-time 10% off</p>
<p style="text-align: right;">Page 167</p> <p>1 BY MR. BOWER:</p> <p>2 Q. All right. Just so the record</p> <p>3 is clear, we're going to enter a new</p> <p>4 Exhibit 6 so we can keep our numbers</p> <p>5 sequential. There we go. And then we'll do</p> <p>6 Exhibit 7 after this one.</p> <p>7 (Document review.)</p> <p>8 BY MR. BOWER:</p> <p>9 Q. Okay. You've been handed</p> <p>10 what's been marked as Exhibit 6. It's a</p> <p>11 Walmart document. It's WMT_MDL_000021802.</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 MR. BOWER: Our realtime has</p> <p>24 gone out. Can we go off record for a</p> <p>25 moment.</p>	<p style="text-align: right;">Page 169</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>

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[REDACTED]

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[REDACTED]

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Page 173

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Q. I'm sorry, the numbering threw me off again, but here's Exhibit 7 back.

MR. BOWER: You guys still have 7, right?

MS. FUMERTON: I do.

MR. BOWER: Okay.

BY MR. BOWER:

Q. Okay. Now you've been handed what's been marked as Exhibit 7. You'll notice the top of that document is redacted because it's an Actavis document, and we're not allowed to show you the communications that you're not on, so that's the reason for the redaction, just so you know.

A. Okay.

Q. So my questions will be directed to the communications you are on,

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1 which is just an e-mail from yourself to  
2 Mr. Cohen.  
3 Do you see that?  
4 A. Yes.  
5 MS. FUMERTON: And can I just  
6 ask a clarifying question?  
7 MR. BOWER: Sure.  
8 MS. FUMERTON: So this is the  
9 redaction that you put on.  
10 MR. BOWER: Yes.  
11 MS. FUMERTON: This is not how  
12 Actavis -- okay. Thank you.  
13 MR. BOWER: Yeah, I want to be  
14 clear, yeah. The redactions --  
15 there's a few more redactions that we  
16 added because the following e-mail she  
17 was not on.  
18 MS. FUMERTON: Okay.  
19 MR. BOWER: So just to avoid  
20 any issues we just redacted the whole  
21 thing.  
22 MS. FUMERTON: Okay.  
23 BY MR. BOWER:  
24 Q. Can you just -- do you recall  
25 this e-mail or what was going on in this time

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[REDACTED]

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1 period?  
[REDACTED]

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[REDACTED]

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[REDACTED]

Page 180

[REDACTED]

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[REDACTED]

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[REDACTED]

Page 183

[REDACTED]

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[REDACTED]

11 Q. You can put this one aside.  
12 (Walmart-Little Exhibit 9  
13 marked.)  
14 BY MR. BOWER:  
15 Q. Let me hand you what's been  
16 marked as Exhibit 9, so please review the  
17 document before I ask you.  
18 (Document review.)  
19 BY MR. BOWER:  
20 Q. Have you had a chance to review  
21 the document?  
22 A. Yes.

[REDACTED]

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[REDACTED]

Page 188

[REDACTED]

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[REDACTED]

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[REDACTED]

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<p>Page 190</p> <p>[REDACTED]</p>	<p>Page 192</p> <p>[REDACTED]</p>
<p>Page 191</p> <p>[REDACTED]</p>	<p>Page 193</p> <p>[REDACTED]</p>

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[REDACTED]

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[REDACTED]

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[REDACTED]

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[REDACTED]

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[REDACTED]

Page 219

[REDACTED]

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[REDACTED]

10 MS. FUMERTON: We're right at  
11 12:00. Is this a good stopping point?

12 MR. BOWER: Let me just see.  
13 Just give me one second.

14 MS. FUMERTON: Are you okay  
15 with going for a couple of more  
16 minutes?

17 MR. BOWER: We may not. Let me  
18 just -- I just want to see if I can  
19 wrap up this whole question --

20 MS. FUMERTON: Okay.

21 MR. BOWER: -- contract issue  
22 quickly.

23 Let's just do one more and then  
24 we can take a lunch break. Just  
25 another brief contract.

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<p style="text-align: right;">Page 222</p> <p>1 (Walmart-Little Exhibit 12 2 marked.) 3 BY MR. BOWER: 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 MR. CIULLO: Again, I'll raise 12 the same objection before that to the 13 extent it's produced under the 14 Allergan MDL case numbers -- 15 MR. BOWER: It says 16 confidential on it. 17 MR. CIULLO: Strike that. 18 Thank you. 19 MR. BOWER: Sure. I tried to 20 pull the confidential ones that I 21 could find. 22 Let me know when you're done, 23 okay? 24 THE WITNESS: Okay. 25 (Document review.)</p>	<p style="text-align: right;">Page 224</p> <p>1 do is provide the complete contract so 2 the record was clear. 3 MS. FUMERTON: Okay. So we'll 4 just make -- 5 MR. BOWER: If Walmart wants to 6 make a supplemental production that it 7 believes this contract is not clear or 8 if it has this contract in its 9 possession, custody or control, it 10 should produce it. 11 MS. FUMERTON: I'm talking 12 specific to this exhibit, and I'm 13 saying that this particular exhibit 14 suggests that there's two missing 15 pages -- 16 MR. BOWER: And if Walmart has 17 this specific contract, it should 18 produce it. And if Walmart has any of 19 these contracts, it should produce 20 them. 21 MS. FUMERTON: I'm objecting to 22 this exhibit because it appears 23 there's two pages missing. 24 MR. BOWER: It does not appear. 25 It says page 3 of 4. Excuse me.</p>
<p style="text-align: right;">Page 223</p> <p>1 MS. FUMERTON: I'll just note 2 for the record with respect to 3 Exhibit 12 that in the upper 4 right-hand corner it suggests it's 5 page 3 of 4, and it's a two-page 6 document. 7 MR. BOWER: And I'll note for 8 the record that Walmart did not 9 produce this document. I'm not sure 10 why. There's lots of documents here 11 Walmart hasn't produced. 12 So if you want to inform us as 13 to why, that would maybe help clear up 14 the record. 15 That's why we're using lots of 16 documents from other defendants 17 because Walmart hasn't produced much 18 of this stuff. Very concerning. 19 MS. FUMERTON: Well, I disagree 20 with your characterizations, but in 21 any event, has Actavis -- did you make 22 this document from a four-page 23 document to a two-page document? 24 MR. BOWER: I tried -- I don't 25 recall, but what I do recall trying to</p>	<p style="text-align: right;">Page 225</p> <p>1 Let's ask the witness whether she 2 believes there's a page missing from 3 this contract. 4 BY MR. BOWER: 5 Q. Have you had a chance to review 6 the document? 7 MS. FUMERTON: Okay. To be 8 clear, since you're misunderstanding 9 my objection, my objection is to the 10 exhibit. There appears that there are 11 a couple of pages missing from the 12 exhibit as indicated on the document 13 itself. 14 MR. BOWER: No, this is 15 intended -- 16 MS. FUMERTON: I'm not making a 17 statement as to whether or not the 18 contract is or is not complete. 19 MR. BOWER: Are you finished? 20 MS. FUMERTON: Yes. 21 MR. BOWER: Okay. For the 22 record, this exhibit is intended to be 23 a contract that Walmart signed. It 24 appears to us to be a two-page 25 contract.</p>

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1 If that's wrong, please let us  
 2 know and we'll try to figure out why  
 3 something is missing.  
 4 And I would note that if  
 5 Walmart would, in fact, produce these  
 6 contracts, we might have more insight  
 7 as to what they allege is missing.  
 8 MS. FUMERTON: Again --  
 9 MR. BOWER: So with that --  
 10 MS. FUMERTON: Zach, you keep  
 11 misrepresenting what I'm saying. I'm  
 12 not making any representation as to  
 13 whether or not there's something  
 14 missing from the contract.  
 15 I'm saying there's something  
 16 that appears to be missing from the  
 17 document and the exhibits because  
 18 there are two pages that are missing.  
 19 So if you're going to repeat  
 20 what I said, I would appreciate it if  
 21 you would do so accurately and to not  
 22 interject all sorts of other  
 23 misleading information.  
 24 MR. BOWER: Okay.  
 25 MS. FUMERTON: The record will

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1 [REDACTED]  
 2 [REDACTED]  
 3 [REDACTED]  
 4 [REDACTED]  
 5 [REDACTED]  
 6 [REDACTED]  
 7 [REDACTED]  
 8 [REDACTED]  
 9 [REDACTED]  
 10 [REDACTED]  
 11 [REDACTED]  
 12 [REDACTED]  
 13 [REDACTED]  
 14 [REDACTED]  
 15 [REDACTED]  
 16 [REDACTED]  
 17 [REDACTED]  
 18 [REDACTED]  
 19 [REDACTED]  
 20 [REDACTED]  
 21 [REDACTED]  
 22 [REDACTED]  
 23 MR. BOWER: Okay. Thank you.  
 24 We can break for lunch.  
 25 THE VIDEOGRAPHER: Going off

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1 say what it is, and I suggest we move  
 2 on.  
 3 MR. BOWER: Just to clear up  
 4 what you said, my response to that is:  
 5 I think Walmart should produce these,  
 6 okay?  
 7 BY MR. BOWER:  
 8 Q. So with that, have you had a  
 9 chance to review the documents?  
 10 A. I did.

1 [REDACTED]  
 2 [REDACTED]  
 3 [REDACTED]  
 4 [REDACTED]  
 5 [REDACTED]  
 6 [REDACTED]  
 7 [REDACTED]  
 8 [REDACTED]  
 9 [REDACTED]  
 10 [REDACTED]  
 11 [REDACTED]  
 12 [REDACTED]  
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 14 [REDACTED]  
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 19 [REDACTED]  
 20 [REDACTED]  
 21 [REDACTED]  
 22 [REDACTED]  
 23 [REDACTED]  
 24 [REDACTED]  
 25 [REDACTED]

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1 the record, 12:06 p.m.  
 2 (Recess taken, 12:06 p.m. to  
 3 12:48 p.m.)  
 4 THE VIDEOGRAPHER: Back on  
 5 record, 12:48 p.m.  
 6 BY MR. BOWER:  
 7 Q. Good afternoon, Ms. Little.  
 8 You understand you're still under oath?  
 9 A. Yes, I do.  
 10 Q. I just have a couple of cleanup  
 11 questions from this morning.

1 [REDACTED]  
 2 [REDACTED]  
 3 [REDACTED]  
 4 [REDACTED]  
 5 [REDACTED]  
 6 [REDACTED]  
 7 [REDACTED]  
 8 [REDACTED]  
 9 [REDACTED]  
 10 [REDACTED]  
 11 [REDACTED]  
 12 [REDACTED]  
 13 [REDACTED]  
 14 [REDACTED]  
 15 [REDACTED]  
 16 [REDACTED]  
 17 [REDACTED]  
 18 [REDACTED]  
 19 [REDACTED]  
 20 [REDACTED]  
 21 [REDACTED]  
 22 [REDACTED]  
 23 [REDACTED]  
 24 [REDACTED]  
 25 [REDACTED]

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[REDACTED]

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[REDACTED]

15 (Walmart-Little Exhibit 13  
16 marked.)

17 BY MR. BOWER:

18 Q. I'll hand you what's been  
19 marked as Exhibit 13. Just take a moment and  
20 review that document. Again, this is another  
21 document that was redacted up until the point  
22 that you're included on the e-mail chain,  
23 okay? Just in case you're wondering why  
24 those redactions are there.

25 (Document review.)

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[REDACTED]

Page 233

1 BY MR. BOWER:

2 Q. Are you finished reviewing the  
3 document?

4 A. Yes.

[REDACTED]

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9  
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11  
12

BY MR. BOWER:

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<div>Page 238</div> <div>[REDACTED]</div>	<div>Page 240</div> <div>[REDACTED]</div>
<div>Page 239</div> <div>[REDACTED]</div>	<div>Page 241</div> <div>[REDACTED]</div>

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[REDACTED]

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[REDACTED]

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[REDACTED]

Page 245

[REDACTED]

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21 MS. FUMERTON: Objection, form.  
 22 And, Zach, the numbers --  
 23 MR. BOWER: Can you just let  
 24 her answer the question first and then  
 25 you can make your statement.

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19 Q. Okay. Thank you.  
 20 MR. BOWER: Tara, did you want  
 21 to make a statement?  
 22 MS. FUMERTON: Yeah, I just  
 23 want to make a statement that the  
 24 numbers I think got transposed when  
 25 you were reading them and it did

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1 MS. FUMERTON: Well, if you  
 2 would read it accurately, it would  
 3 make it a lot more helpful.  
 4 MR. BOWER: Well, the document  
 5 is what it is, right?  
 6 MS. FUMERTON: Then the  
 7 testimony gets all screwed up because  
 8 you're asking questions on numbers  
 9 that don't match with what the  
 10 document says.  
 11 MR. BOWER: So why don't we let  
 12 her answer the question. Then you can  
 13 make any statements you want for the  
 14 record, okay?

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1 not -- the questions did not reflect  
 2 accurately the numbers that were on  
 3 hand, the numbers that were shipped  
 4 and the numbers that -- the difference  
 5 between the two.  
 6 MR. BOWER: Okay.  
 7 BY MR. BOWER:



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<div>Page 251</div> <div></div>	<div>Page 253</div> <div></div>

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[REDACTED]

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1 BY MR. BOWER:  
2 Q. Thank you.  
3 (Walmart-Little Exhibit 14  
4 marked.)  
5 BY MR. BOWER:  
6 Q. Okay. You've been handed  
7 what's been marked as Exhibit 14. I tried to  
8 include all the attachments. It's a Walmart  
9 document and I believe it's sequential. I  
10 don't have too many questions on the  
11 attachments, but I just included them so you  
12 could review them if you would like.

[REDACTED]

19 So with that in mind, take your  
20 time and review the document.

21 A. Thank you.

22 MR. BOWER: Sorry, and the  
23 Bates number begins with  
24 WMT\_MDL\_000021669, and it goes through  
25 21678.

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[REDACTED]

Page 257

1 (Document review.)  
2 BY MR. BOWER:  
3 Q. Are you still reading the  
4 document?

5 A. I am finished.

[REDACTED]

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10 Q. Okay. At this point, were you  
11 aware that OxyContin was being abused across  
12 the country?

13 MS. FUMERTON: Objection, form.

14 A. I was aware that people that  
15 had prescriptions for pain medicine sometimes  
16 used those for ways other than they were  
17 prescribed, yes.

18 BY MR. BOWER:

19 Q. And specifically OxyContin,  
20 correct?

21 MS. FUMERTON: Objection, form.

22 MR. BOWER: I'll strike that.

23 BY MR. BOWER:

24 Q. Did you have that specific  
25 understanding with respect to OxyContin, or

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1 not?

2 MS. FUMERTON: Objection, form.

3 A. I had the understanding for all  
4 C-II products.

5 BY MR. BOWER:

6 Q. Well, let me direct your  
7 attention then to Bates -- it's a few pages  
8 into the document ending in Bates number 673.

9 You see that page?

10 A. 673, yes.

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<div>Page 262</div> <div>[REDACTED]</div>	<div>Page 264</div> <div>[REDACTED]</div>
<div>Page 263</div> <div>[REDACTED]</div>	<div>Page 265</div> <div>[REDACTED]</div> <div>14 BY MR. BOWER:</div> <div>15 Q. Okay.</div> <div>16 (Walmart-Little Exhibit 15</div> <div>17 marked.)</div> <div>18 BY MR. BOWER:</div> <div>[REDACTED]</div>

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1 MR. CIULLO: While she's  
2 reviewing, can you please read the  
3 Bates.  
4 MR. BOWER: Sure. It starts  
5 with WMT\_MDL\_000021921, and it ends in  
6 21924.  
7 MR. CIULLO: Thank you very  
8 much.  
9 (Document review.)  
10 BY MR. BOWER:  
11 Q. Are you done?  
12 A. I'm done.

[REDACTED]

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[REDACTED]

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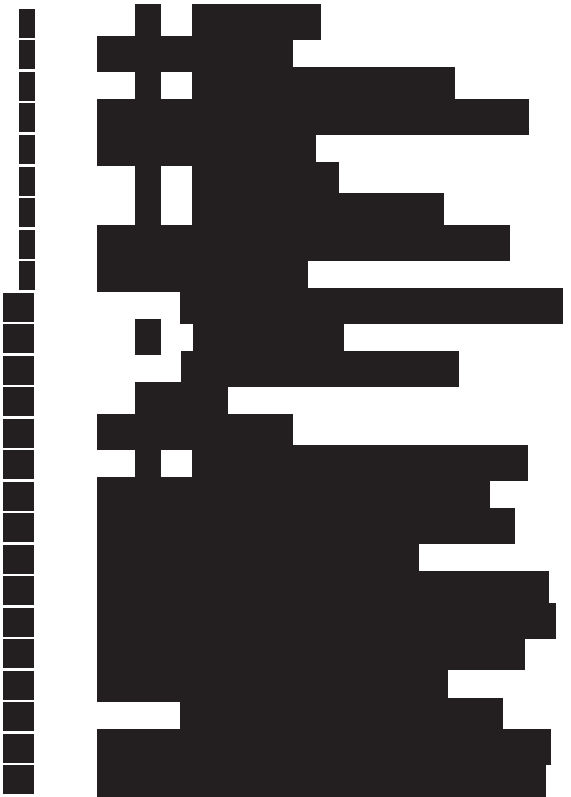
[REDACTED]

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68 (Pages 266 to 269)

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<p>Page 270</p>  A large rectangular area of the page is completely redacted with black ink. To the left of this area is a vertical column of approximately 25 small, empty square boxes, likely representing a list or table structure.	<p>Page 272</p>  A large rectangular area of the page is completely redacted with black ink. To the left of this area is a vertical column of approximately 25 small, empty square boxes, likely representing a list or table structure.
<p>Page 271</p>  A large rectangular area of the page is completely redacted with black ink. To the left of this area is a vertical column of approximately 25 small, empty square boxes, likely representing a list or table structure.	<p>Page 273</p>  A large rectangular area of the page is completely redacted with black ink. To the left of this area is a vertical column of approximately 25 small, empty square boxes, likely representing a list or table structure.

69 (Pages 270 to 273)

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Page 274

[REDACTED]

Page 276

[REDACTED]

Page 275

[REDACTED]

Page 277

[REDACTED]

70 (Pages 274 to 277)

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Page 278

[REDACTED]

Page 280

1 MS. FUMERTON: No, you're not.  
2 It's not -- no, actually. You can ask  
3 yes-or-no questions that go towards  
4 privileged information.

5 MR. BOWER: What privileged  
6 information would be called for by  
7 that answer, whether you asked her --

8 MS. FUMERTON: To the extent --  
9 (Simultaneous discussion  
10 interrupted by the reporter.)

11 MS. FUMERTON: To the extent  
12 that I've had conversations with her,  
13 I don't know that any are implicated  
14 here. I'm not saying they are, but  
15 it's an inappropriate type of  
16 question.

17 MR. BOWER: Are you instructing  
18 her not to answer that?

19 MS. FUMERTON: Yes, I did.

20 BY MR. BOWER:

21 Q. Are you going to listen to  
22 those instructions?

23 A. I am.

[REDACTED]

Page 279

1 [REDACTED]  
2 MS. FUMERTON: Objection, form.  
3 And I also object to the extent that  
4 you're asking a privileged question,  
5 so I'm actually going to instruct her  
6 not to answer.

7 MR. BOWER: I'm just trying to  
8 figure out why Walmart hasn't produced  
9 them.

10 BY MR. BOWER:

[REDACTED]

18 MS. FUMERTON: Objection.  
19 Again, I'm going to instruct her not  
20 to answer that question because you're  
21 asking to potentially invade  
22 privileged information.

23 MR. BOWER: It's just a  
24 yes-or-no question. She's allowed to  
25 answer it.

Page 281

[REDACTED]

71 (Pages 278 to 281)



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Page 282

[REDACTED]

Page 284

1 (Recess taken, 1:45 p.m. to  
2 2:09 p.m.)  
3 THE VIDEOGRAPHER: Back on  
4 record at 2:09 p.m.  
5 BY MR. BOWER:  
6 Q. We're back on the record. Do  
7 you understand you're still under oath?  
8 A. I do.

[REDACTED]

Page 283

[REDACTED]

18 Q. Okay.  
19 MR. BOWER: You want to keep  
20 going or do you want to take a break?  
21 MS. FUMERTON: Let's take a  
22 break.  
23 MR. BOWER: Okay.  
24 THE VIDEOGRAPHER: Going off  
25 the record, 1:45 p.m.

Page 285

[REDACTED]

15 Q. Okay.  
16 (Walmart-Little Exhibit 18  
17 marked.)  
18 BY MR. BOWER:  
19 Q. You've been handed what's been  
20 marked as Exhibit 18. Again, it's a document  
21 produced by an entity other than Walmart, and  
22 its Bates number is PPLPC, and then  
23 004000325237. And again, this one has  
24 redactions on it just reflecting the fact  
25 that you weren't copied on subsequent

72 (Pages 282 to 285)

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<p style="text-align: right;">Page 286</p> <p>1 e-mails, okay?</p> <p>2 A. Okay.</p> <p>3 Q. So take a moment to review your</p> <p>4 document, and then this may refresh your</p> <p>5 recollection about the gentleman I just asked</p> <p>6 about.</p> <p>7 (Document review.)</p> <p>8 MR. BOWER: Tara, while we're</p> <p>9 waiting, do you have any understanding</p> <p>10 as to why Walmart hasn't produced this</p> <p>11 document?</p> <p>12 MS. FUMERTON: I don't know</p> <p>13 whether Walmart has or has not.</p> <p>14 MR. BOWER: I'm saying it</p> <p>15 hasn't. Do you know why they haven't?</p> <p>16 MS. FUMERTON: Well, in my</p> <p>17 experience, based on things you say we</p> <p>18 haven't produced, a lot of them we've</p> <p>19 already produced.</p> <p>20 MR. BOWER: So are you saying</p> <p>21 Walmart has produced this?</p> <p>22 MS. FUMERTON: I think I</p> <p>23 answered your question, which was I do</p> <p>24 not know whether Walmart has or has</p> <p>25 not produced this.</p>	<p style="text-align: right;">Page 288</p> <p>1 incorrect and you know it.</p> <p>2 MS. FUMERTON: I know it's</p> <p>3 absolutely true.</p> <p>4 MR. BOWER: You can</p> <p>5 misrepresent the record all you want,</p> <p>6 but you know that's incorrect, and you</p> <p>7 know that there's thousands if not</p> <p>8 hundreds of thousands you are</p> <p>9 wrongfully withholding.</p> <p>10 You haven't looked for them.</p> <p>11 You haven't looked in the proper</p> <p>12 areas. You haven't produced</p> <p>13 contracts. There's hundreds of</p> <p>14 contracts you haven't produced.</p> <p>15 MS. FUMERTON: I haven't</p> <p>16 them -- I haven't produced any</p> <p>17 contracts?</p> <p>18 MR. BOWER: Not all the</p> <p>19 contracts, no.</p> <p>20 MS. FUMERTON: I don't think</p> <p>21 that's right.</p> <p>22 MR. BOWER: There's lots of</p> <p>23 contracts you haven't produced.</p> <p>24 MS. FUMERTON: Zach, everything</p> <p>25 you've said basically is false. Why</p>
<p style="text-align: right;">Page 287</p> <p>1 MR. BOWER: Would there be a</p> <p>2 reason that they have not produced</p> <p>3 this?</p> <p>4 MS. FUMERTON: There could be.</p> <p>5 MR. BOWER: What would be that</p> <p>6 reason?</p> <p>7 MS. FUMERTON: I'm not taking</p> <p>8 my deposition today, but if you want</p> <p>9 to continue to have this discussion on</p> <p>10 the record, it could be for a variety</p> <p>11 of reasons.</p> <p>12 MR. BOWER: Such as?</p> <p>13 MS. FUMERTON: It didn't exist,</p> <p>14 it wasn't responsive. I'm not saying</p> <p>15 any of these. You asked me a</p> <p>16 hypothetical question. I could ask</p> <p>17 you hypothetically, I don't even know</p> <p>18 whether this has or has not been</p> <p>19 produced, Zach.</p> <p>20 As I said before, it's my</p> <p>21 experience in many occasions you send</p> <p>22 us requests for information that we've</p> <p>23 already produced and you don't realize</p> <p>24 that you have it.</p> <p>25 MR. BOWER: That is absolutely</p>	<p style="text-align: right;">Page 289</p> <p>1 don't we just leave it at that.</p> <p>2 MR. BOWER: Not true.</p> <p>3 (Document review.)</p> <p>4 BY MR. BOWER:</p> <p>5 Q. Are you still reviewing?</p> <p>6 A. I am.</p> <p>7 Q. Okay.</p> <p>8 (Document review.)</p> <p>9 BY MR. BOWER:</p> <p>10 Q. You ready?</p> <p>11 A. I'm done.</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>

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[REDACTED]

Page 292

[REDACTED]

Page 291

[REDACTED]

Page 293

[REDACTED]

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<p>Page 294</p> <p>[REDACTED]</p>	<p>Page 296</p> <p>[REDACTED]</p>
<p>Page 295</p> <p>[REDACTED]</p>	<p>Page 297</p> <p>[REDACTED]</p>

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Page 298

[REDACTED]

Page 300

[REDACTED]

Page 299

[REDACTED]

Page 301

[REDACTED]

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Page 302

[REDACTED]

Page 304

[REDACTED]

Page 303

[REDACTED]

Page 305

1 (Walmart-Little Exhibit 19  
2 marked.)  
3 MR. BOWER: I'm just making  
4 sure the redactions are right.  
5 BY MR. BOWER:  
6 Q. You've been handed what's been  
7 marked as Exhibit 19. Please take a moment  
8 and review the document.  
9 The Bates stamp is ACTAVIS, and  
10 then 0361537 -- I'm sorry, that Bates number  
11 is the number -- the page number of the first  
12 unredacted page. The first page of the  
13 exhibit ends in 535, just so the record is  
14 clear.  
15 (Document review.)  
16 BY MR. BOWER:  
17 Q. Are you ready?  
18 A. Yes.  
19 Q. Okay. Sorry.

[REDACTED]

77 (Pages 302 to 305)

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Page 306

[REDACTED]

Page 308

[REDACTED]

Page 307

[REDACTED]

Page 309

[REDACTED]

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[REDACTED]

Page 316

[REDACTED]

Page 315

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Page 317

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[REDACTED]

Page 320

[REDACTED]

Page 319

[REDACTED]

Page 321

[REDACTED]

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[REDACTED]

Page 324

[REDACTED]

Page 323

[REDACTED]

Page 325

[REDACTED]

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[REDACTED]

Page 328

[REDACTED]

Page 327

[REDACTED]

Page 329

[REDACTED]

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Page 330

[REDACTED]

Page 332

[REDACTED]

Page 331

[REDACTED]

Page 333

[REDACTED]

16  
17  
18  
19  
20  
21  
22  
23  
24  
25

MS. FUMERTON: Are you saying  
responds to --

MR. BOWER: Yeah.

MS. FUMERTON: Where are you  
looking?

MR. BOWER: Rae, top of the  
page ending in 06, Rae's response to  
Maria.

MS. FUMERTON: You're working  
backwards unless I'm not --

84 (Pages 330 to 333)

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Page 334

1 MR. BOWER: I'm looking at the  
2 top of the page ending in 06. I  
3 believe the witness sees it.  
4 MS. FUMERTON: Oh, I'm sorry.  
5 It's said twice in the document. It's  
6 on a different paragraph.  
7 MR. BOWER: Okay. I'm sorry.  
8 MS. FUMERTON: Okay. So I'm  
9 with you now. I'm sorry, that's my  
10 fault.  
11 MR. BOWER: No problem.  
12 MS. FUMERTON: Okay.  
13 BY MR. BOWER:

[REDACTED]

Page 336

[REDACTED]

Page 335

[REDACTED]

Page 337

[REDACTED]

6 So just take a moment and  
7 review it, and then we can have some  
8 questions on it.

9 (Document review.)

10 MR. BOWER: While the witness  
11 is reading the document, the Bates  
12 number of this one is ALLERGAN\_MDL and  
13 it's 00144683 through -- and the  
14 attachment is 684, and then 685 is a  
15 native, and we included the native  
16 with a cover sheet.

17 (Document review.)

18 BY MR. BOWER:

19 Q. Are you done reviewing the  
20 document?

21 A. Not yet.

22 Q. Okay.

23 (Document review.)

24 BY MR. BOWER:

25 Q. Are you ready?

85 (Pages 334 to 337)

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<p style="text-align: right;">Page 338</p> <p>1 A. I'm done.</p> <p>[REDACTED]</p>	<p style="text-align: right;">Page 340</p> <p>1 she's finished, that's fine.</p> <p>2 MR. BOWER: No, no, I</p> <p>3 apologize. Please finish.</p> <p>[REDACTED]</p>
<p style="text-align: right;">Page 339</p> <p>[REDACTED]</p> <p>17 BY MR. BOWER:</p> <p>18 Q. Well, if you look at the</p> <p>19 e-mail, Mr. Cohen is telling you --</p> <p>20 MS. FUMERTON: She hadn't</p> <p>21 finished her question.</p> <p>22 MR. BOWER: No, she said --</p> <p>23 okay. Have you finished your answer?</p> <p>24 MS. FUMERTON: She was still</p> <p>25 talking and you started talking. If</p>	<p style="text-align: right;">Page 341</p> <p>[REDACTED]</p>

86 (Pages 338 to 341)

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Page 342

1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 Just take a moment to review  
6 the document.  
7 (Document review.)  
8 BY MR. BOWER:  
9 Q. Are you still reviewing the  
10 document?  
11 MS. FUMERTON: Are you --  
12 A. I'm okay.  
13 BY MR. BOWER:  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]

Page 344

1 A. And in my -- in my --  
2 MS. FUMERTON: Objection. I  
3 mean, there's no question pending.  
4 MR. BOWER: The witness is  
5 saying this is unclear, and --  
6 MS. FUMERTON: Okay. Well, you  
7 didn't ask a question, and you're  
8 making commentary, just sort of random  
9 commentary on her questions.  
10 So if you have a question, you  
11 can ask her. Otherwise I'm objecting  
12 and -- to just your additional  
13 commentary on what she's saying.  
14 BY MR. BOWER:  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]

Page 343

1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
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19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]

Page 345

1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]

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[REDACTED]

Page 348

[REDACTED]

Page 347

[REDACTED]

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[REDACTED]

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[REDACTED]

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[REDACTED]

Page 351

[REDACTED]

Page 353

[REDACTED]

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Page 354

7 (Walmart-Little Exhibit 24  
8 marked.)  
9 BY MR. BOWER:  
10 Q. You've been handed what's been  
11 marked as Exhibit 24.  
12 MS. FUMERTON: We've been going  
13 for a while. Is this a good stopping  
14 point? We've been going, I think, for  
15 another hour 20 minutes or so.  
16 MR. BOWER: We've been going  
17 that long? Sure. I didn't know we  
18 had been going that long. Sure.  
19 THE VIDEOGRAPHER: Off the  
20 record, 3:22 p m.  
21 (Recess taken, 3:22 p m. to  
22 3:41 p m.)  
23 THE VIDEOGRAPHER: Back on  
24 record. The time is 3:41 p.m.  
25 ///

Page 356

[REDACTED]

Page 355

1 BY MR. BOWER:  
2 Q. Okay. Ms. Little, before we  
3 went off, I handed you Exhibit 24, but you  
4 haven't reviewed it yet. So why don't you  
5 take a moment to review that, and then I'll  
6 have just a few questions on this one.  
7 (Document review.)  
8 BY MR. BOWER:  
9 Q. All right. Are you ready?  
10 A. Yes.

[REDACTED]

Page 357

[REDACTED]

90 (Pages 354 to 357)

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Page 358

[REDACTED]

Page 360

[REDACTED]

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[REDACTED]

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[REDACTED]

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[REDACTED]

Page 364

[REDACTED]

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[REDACTED]

Page 365

[REDACTED]

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[REDACTED]

Page 368

[REDACTED]

Page 367

[REDACTED]

Page 369

[REDACTED]

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Page 370

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15  
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17  
18  
19

[REDACTED]

MR. CIULLO: I'm sorry, can you read the Bates.

MR. BOWER: Sure. This is a Walmart document. The Bates number is WMT\_MDL\_000037807 and 808.

MR. CIULLO: Thank you, sir.

MR. BOWER: Sure.

MS. FUMERTON: I'll just note for the record that this document is missing its attachment.

(Document review.)

BY MR. BOWER:

[REDACTED]

Page 372

[REDACTED]

[REDACTED]

Page 371

[REDACTED]

[REDACTED]

Page 373

[REDACTED]

[REDACTED]

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Page 374

2 [REDACTED]  
3 The Bates number for this one  
4 is WMT\_MDL\_000033418 through 33424.  
5 (Document review.)  
6 BY MR. BOWER:  
7 Q. Are you ready?  
8 MS. FUMERTON: She's still  
9 reading.  
10 A. I'm not.  
11 MR. BOWER: Okay. Sorry.  
12 (Document review.)  
13 (Telephonic interruption.)  
14 (Comments off the stenographic  
15 record.)  
16 MR. BOWER: Can we go off the  
17 record.  
18 THE VIDEOGRAPHER: Going off  
19 the record, 4:09 p.m.  
20 (Discussion off the record.)  
21 THE VIDEOGRAPHER: Back on  
22 record, 4:10 p.m.  
BY MR. BOWER:  
[REDACTED]

Page 376

[REDACTED]

Page 375

[REDACTED]

Page 377

[REDACTED]

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[REDACTED]

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[REDACTED]

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[REDACTED]

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[REDACTED]

Page 384

[REDACTED]

Page 383

[REDACTED]

Page 385

[REDACTED]

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Page 390

[REDACTED]

Page 392

[REDACTED]

Page 391

[REDACTED]

Page 393

[REDACTED]

15 (Walmart-Little Exhibit 28  
16 marked.)

17 BY MR. BOWER:

18 Q. Okay. You've been handed  
19 what's been marked as Exhibit 28. It's a  
20 Walmart document ending in 21757 through 59.  
21 It's a two-page e-mail. Let me know when you  
22 finish reviewing.

23 A. Okay.  
24 (Document review.)

25 ///

99 (Pages 390 to 393)

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Page 394

1 BY MR. BOWER:  
2 Q. Are you ready?  
3 A. Yes.

[REDACTED]

Page 396

[REDACTED]

Page 395

[REDACTED]

Page 397

[REDACTED]

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<p>Page 398</p> <p>[REDACTED]</p>	<p>Page 400</p> <p>[REDACTED]</p>
<p>Page 399</p> <p>[REDACTED]</p>	<p>Page 401</p> <p>[REDACTED]</p>

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<p>Page 402</p> <p>[REDACTED]</p>	<p>Page 404</p> <p>[REDACTED]</p>
<p>Page 403</p> <p>[REDACTED]</p>	<p>Page 405</p> <p>[REDACTED]</p> <p>3 MR. BOWER: Why don't we take a</p> <p>4 break.</p> <p>5 MS. FUMERTON: Okay.</p> <p>6 THE VIDEOGRAPHER: Going off</p> <p>7 the record, 4:37 p.m.</p> <p>8 (Recess taken, 4:37 p.m. to</p> <p>9 4:52 p.m.)</p> <p>10 THE VIDEOGRAPHER: Back on</p> <p>11 record at 4:51 p.m.</p> <p>12 BY MR. BOWER:</p> <p>13 Q. All right. Ms. Little, we're</p> <p>14 back on the record. We'll try to finish up</p> <p>15 here, do the best we can.</p> <p>16 (Walmart-Little Exhibit 29</p> <p>17 marked.)</p> <p>18 BY MR. BOWER:</p> <p>[REDACTED]</p>

102 (Pages 402 to 405)

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Page 406

1 [REDACTED]  
 2 MS. FUMERTON: Still take time  
 3 to make sure you understand.  
 4 MR. BOWER: Yeah, yeah, please  
 5 do. I just -- I'm not going to be  
 6 asking, I don't think, any questions  
 7 on the attachments.  
 8 (Document review.)  
 9 BY MR. BOWER:  
 10 Q. Are you ready?  
 11 A. I'm not ready.  
 12 Q. And I'll note again, I'm just  
 13 asking you about the first page of the  
 14 document, so tell me when you've had a chance  
 15 to review that, okay?  
 16 (Document review.)  
 17 A. Okay.  
 18 BY MR. BOWER:

19 [REDACTED]  
 20 [REDACTED]  
 21 [REDACTED]  
 22 [REDACTED]  
 23 [REDACTED]  
 24 [REDACTED]  
 25 [REDACTED]

Page 407

1 [REDACTED]  
 2 [REDACTED]  
 3 [REDACTED]  
 4 [REDACTED]  
 5 MS. FUMERTON: Zach, the Bates  
 6 numbers are out of order. I don't  
 7 know if that's -- I don't know why.  
 8 MR. BOWER: I'm not sure  
 9 either, but it's Walmart's production.  
 10 MR. FAUVRE: Could we get the  
 11 Bates number on the document?  
 12 MR. BOWER: Sure. It starts in  
 13 7254 -- the e-mail -- you want to just  
 14 do the e-mail?  
 15 MS. FUMERTON: Okay. Look, I  
 16 don't know what this is. I have no  
 17 personal knowledge and I don't know if  
 18 it's on our end. My next question is  
 19 do you have a question with the  
 20 e-mail, because I do see like it  
 21 looks -- it looks a little off with  
 22 the numbers.  
 23 MR. BOWER: Right, right.  
 24 MS. FUMERTON: I'm just  
 25 wondering if this is an attachment.

Page 408

1 I'm just saying it's a possibility.  
 2 MR. BOWER: E-mailed an  
 3 attachment?  
 4 MS. FUMERTON: Yeah. The  
 5 attachments got out of order.  
 6 MR. BOWER: My questions are  
 7 only on the pages ending in 7245 and  
 8 7246, and I'm just trying to figure  
 9 out how this --  
 10 MR. FAUVRE: Can we get the  
 11 full Bates number, please?  
 12 MR. BOWER: Who is that on the  
 13 phone?  
 14 MR. FAUVRE: This is David  
 15 Fauvre for Endo and Par. Can we get  
 16 the full Bates numbers?  
 17 MS. FUMERTON: Yeah, David, it  
 18 starts 245 -- well...  
 19 MR. BOWER: I believe it was in  
 20 your hard copy production. That might  
 21 explain it.  
 22 MR. FAUVRE: What's the prefix?  
 23 MR. BOWER: Prefix is a Walmart  
 24 document, WMT\_MDL.  
 25 MS. FUMERTON: I don't know.

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1 MR. BOWER: Okay. Well, why  
 2 don't -- look, I'm not going to ask  
 3 any questions.  
 4 MS. FUMERTON: That's fine.  
 5 MR. BOWER: Why don't we just  
 6 leave it as it is. I don't think  
 7 there's anything controversial in it.  
 8 BY MR. BOWER:

9 [REDACTED]  
 10 [REDACTED]  
 11 [REDACTED]  
 12 [REDACTED]  
 13 [REDACTED]  
 14 [REDACTED]  
 15 [REDACTED]  
 16 [REDACTED]  
 17 [REDACTED]  
 18 [REDACTED]  
 19 [REDACTED]  
 20 [REDACTED]  
 21 [REDACTED]  
 22 [REDACTED]  
 23 [REDACTED]  
 24 [REDACTED]  
 25 [REDACTED]

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<p>Page 410</p> <p>[REDACTED]</p>	<p>Page 412</p> <p>[REDACTED]</p>
<p>Page 411</p> <p>[REDACTED]</p>	<p>Page 413</p> <p>[REDACTED]</p>

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Page 414

[REDACTED]

Page 416

[REDACTED]

Page 415

[REDACTED]

Page 417

[REDACTED]

105 (Pages 414 to 417)

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Page 418

3 [REDACTED]  
4 Q. At this point, the opioid  
5 epidemic had been discussed in the media  
6 frequently, right?  
7 MS. FUMERTON: Objection, form.  
8 A. I don't -- I don't recall  
9 specifically.  
10 BY MR. BOWER:  
11 Q. It would have been the subject  
12 of numerous TV shows, numerous books,  
13 numerous political discussions, right?  
14 MS. FUMERTON: Objection, form.  
15 A. I don't recall.  
BY MR. BOWER:

[REDACTED]

Page 420

3 [REDACTED]  
4 Q. Okay.  
5 (Walmart-Little Exhibit 31  
6 marked.)  
7 BY MR. BOWER:  
8 Q. You've been handed what's been  
9 marked as Exhibit 31, it's a one page e-mail.  
10 Please take a moment to review it.  
11 MR. CIULLO: What's the Bates?  
12 MR. BOWER: Yeah, the Bates  
13 number is -- it's a Walmart document  
14 ending in 21571. It's a one-page  
15 document.  
16 MR. CIULLO: Thank you.  
17 (Document review.)  
18 BY MR. BOWER:  
19 Q. Do you see that?  
A. I do.

[REDACTED]

Page 419

[REDACTED]

Page 421

[REDACTED]

106 (Pages 418 to 421)

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Page 422

[REDACTED]

Page 424

[REDACTED]

9 Q. Okay.  
10 (Walmart-Little Exhibit 32  
11 marked.)  
12 BY MR. BOWER:  
13 Q. You've been handed what's been  
14 marked as Exhibit 32. Take your time to  
15 review it. I can tell you that my questions  
16 are simply focused on the first page at the  
17 top right there, the cc and the handwriting.  
18 Do you see that?  
19 A. Yes.  
20 Q. This is a contract -- you can  
21 review it. I don't mean to --  
22 MS. FUMERTON: At least give  
23 her a chance to see the general --  
24 MR. BOWER: Yeah, yeah.  
25 MS. FUMERTON: It might help

Page 423

[REDACTED]

Page 425

1 inform your questions.  
2 MR. BOWER: Sure.  
3 MR. CIULLO: While we're  
4 waiting, can you give me the Bates?  
5 MR. BOWER: Oh, yeah, sure.  
6 This is a Walmart document again,  
7 25445 through 447.  
8 MR. CIULLO: Thank you very  
9 much.  
10 MR. BOWER: Sure.  
11 (Document review.)  
12 THE WITNESS: Okay.  
13 BY MR. BOWER:  
14 Q. Okay?  
15 A. Yes.

[REDACTED]

107 (Pages 422 to 425)

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Page 426

[REDACTED]

Page 428

[REDACTED]

Page 427

[REDACTED]

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[REDACTED]

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<p>Page 430</p> <p>[REDACTED]</p>	<p>Page 432</p> <p>[REDACTED]</p>
<p>Page 431</p> <p>[REDACTED]</p>	<p>Page 433</p> <p>[REDACTED]</p>

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[REDACTED]

Page 436

[REDACTED]

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[REDACTED]

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[REDACTED]

110 (Pages 434 to 437)

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Page 438

[REDACTED]

Page 440

[REDACTED]

23 MR. BOWER: I have nothing  
24 further. I think my time is up. Why  
25 don't we switch.

Page 439

[REDACTED]

Page 441

1 MS. FUMERTON: I have no  
2 questions.  
3 MR. BOWER: Oh, no questions?  
4 Okay.  
5 THE VIDEOGRAPHER: This ends --  
6 MS. FUMERTON: Go off the  
7 record.  
8 THE VIDEOGRAPHER: This ends  
9 today's deposition. Going off the  
10 record at 5:28 p.m.  
11 (Proceedings recessed at  
12 5:28 p.m.)  
13 --o0o--  
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111 (Pages 438 to 441)



## Highly Confidential - Subject to Further Confidentiality Review

<p style="text-align: right;">Page 442</p> <p>1 CERTIFICATE</p> <p>2 I, MICHAEL E. MILLER, Fellow of</p> <p>3 the Academy of Professional Reporters,</p> <p>4 Registered Diplomat Reporter, Certified</p> <p>5 Realtime Reporter, Certified Court Reporter</p> <p>6 and Notary Public, do hereby certify that</p> <p>7 prior to the commencement of the examination,</p> <p>8 PATSY LITTLE was duly sworn by me to testify</p> <p>9 to the truth, the whole truth and nothing but</p> <p>10 the truth</p> <p>11 I DO FURTHER CERTIFY that the</p> <p>12 foregoing is a verbatim transcript of the</p> <p>13 testimony as taken stenographically by and</p> <p>14 before me at the time, place and on the date</p> <p>15 hereinbefore set forth, to the best of my</p> <p>16 ability</p> <p>17 I DO FURTHER CERTIFY that pursuant</p> <p>18 to FRCP Rule 30, signature of the witness was</p> <p>19 not requested by the witness or other party</p> <p>20 before the conclusion of the deposition</p> <p>21 I DO FURTHER CERTIFY that I am</p> <p>22 neither a relative nor employee nor attorney</p> <p>23 nor counsel of any of the parties to this</p> <p>24 action, and that I am neither a relative nor</p> <p>25 employee of such attorney or counsel, and</p> <p>that I am not financially interested in the</p> <p>action</p> <p>MICHAEL E. MILLER, FAPR, RDR, CRR</p> <p>Fellow of the Academy of Professional Reporters</p> <p>NCRA Registered Diplomat Reporter</p> <p>NCRA Certified Realtime Reporter</p> <p>Certified Court Reporter</p> <p>Notary Public</p> <p>My Commission Expires: 7/9/2020</p> <p>Dated: December 19, 2018</p>	<p style="text-align: right;">Page 444</p> <p>1 ERRATA</p> <p>2 PAGE LINE CHANGE</p> <p>3</p> <p>4 REASON: _____</p> <p>5</p> <p>6 REASON: _____</p> <p>7</p> <p>8 REASON: _____</p> <p>9</p> <p>10 REASON: _____</p> <p>11</p> <p>12 REASON: _____</p> <p>13</p> <p>14 REASON: _____</p> <p>15</p> <p>16 REASON: _____</p> <p>17</p> <p>18 REASON: _____</p> <p>19</p> <p>20 REASON: _____</p> <p>21</p> <p>22 REASON: _____</p> <p>23</p> <p>24 REASON: _____</p> <p>25</p>
<p style="text-align: right;">Page 443</p> <p>1 INSTRUCTIONS TO WITNESS</p> <p>2</p> <p>3 Please read your deposition over</p> <p>4 carefully and make any necessary corrections.</p> <p>5 You should state the reason in the</p> <p>6 appropriate space on the errata sheet for any</p> <p>7 corrections that are made.</p> <p>8 After doing so, please sign the</p> <p>9 errata sheet and date it.</p> <p>10 You are signing same subject to</p> <p>11 the changes you have noted on the errata</p> <p>12 sheet, which will be attached to your</p> <p>13 deposition.</p> <p>14 It is imperative that you return</p> <p>15 the original errata sheet to the deposing</p> <p>16 attorney within thirty (30) days of receipt</p> <p>17 of the deposition transcript by you. If you</p> <p>18 fail to do so, the deposition transcript may</p> <p>19 be deemed to be accurate and may be used in</p> <p>20 court.</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 445</p> <p>1 ACKNOWLEDGMENT OF DEPONENT</p> <p>2</p> <p>3</p> <p>4 I, PATSY LITTLE, do hereby certify</p> <p>5 that I have read the foregoing pages and that</p> <p>6 the same is a correct transcription of the</p> <p>7 answers given by me to the questions therein</p> <p>8 propounded, except for the corrections or</p> <p>9 changes in form or substance, if any, noted</p> <p>10 in the attached</p> <p>11 Errata Sheet.</p> <p>12</p> <p>13 _____ DATE</p> <p>14 PATSY LITTLE</p> <p>15</p> <p>16 Subscribed and sworn to before me this</p> <p>17 _____ day of _____, 20 ____.</p> <p>18 My commission expires: _____</p> <p>19</p> <p>20 _____</p> <p>21 Notary Public</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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1	LAWYER'S NOTES	
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